

Enclosure (2) AMSC Suggestions

Boston AMSC

Suggestions on National Level Polices:

- Cyber Security focus continues to be strong and additional definitive guidance would be beneficial.
- Interagency communications continues to be a main lesson learned in both exercises and real world events. Various temporary solutions work around the challenges of interoperable communications among port partners and temporarily may work effectively for planned events. The unplanned short fused event presents the greatest challenge and that is the very type event where permanent solutions are needed the most.

Long Island Sound (LIS) AMSC

Suggestions on National Level Polices:

- Better use of Homeland Security Information Network (HSIN) for Area Maritime Security Committee (AMSC) collaboration.
- Homeport 2.0 improved guidance.
- Use of Port Security Risk Assessment (PSRA) Virtual Critical Asset Tour (VCAT) on large passenger vessels/ferries.

Suggested Training Topics:

- Sectors and Districts can leverage HSIN adobe connect web conferencing in support of AMSC related activities.
- Training needed for Port Partners.
- As a result of PSRA 2017 conducted in LIS, Partners realized the value of the PSRA VCAT done at the ferry terminals and onboard the ferry to support development of Active Threat/Active Shooter Response Scenarios. Ferry companies have requested PSRA staff return to do VCATS for all ferry vessels.

New York and New Jersey AMSC

Suggestions on National Level Polices:

- Establish National Level Policy relating to Cyber Security issues in the Maritime Domain to consider:
 - Threats to Global Navigation.
 - Software Vulnerabilities and the Human Element.
 - Increased Complexity and potential shrinking budgets could result in more cyber risk for ports.

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- Risk Based Performance Standards.
- Cyber Security Marine Transportation System Recovery Unit (MTSRU) concept - advisory Cyber Working Group in your port.
- The Cyber Incident - looking at it as a Transportation Security Incident (TSI).
- Cyber Incident- maintaining confidentiality.
- Cyber Risk assessment- assemble the team.
- Organization's leadership must recognize and support a strong cyber culture as an "all hands" responsibility.
- Cyber Security- Roles and Responsibilities
 - Department of Homeland Security [DHS]
 - Department of Justice [DOJ]
 - Department of Defense [DOD]
- Set timeline to establish a cyber security regulation in FY 2018.

Northern New England AMSC

Suggestions on National Level Polices:

- The Port Security Grant Program (PSGP) is flawed and needs to be changed to give Captain of the Port (COTP) Zones ranked near the bottoming of the DHS Risk Ranking for COTP Zones a fighting chance for applicants in the zone to receive funding. Consideration should be giving to state with limited state revenue and lacking the resources to fund or support maritime security projects. For example the states of Maine and Vermont. In addition, both states have international borders that are not being considered.

Suggested Training Topics:

- Understanding the national level process of the PSGP.
- On Board Fire Fighting for Land Base Fire Fighters.
 - Preparedness for a Cyber Security Incident.
 - Recovery from a Cyber Security Incident.
 - Developing a Cyber Security Program.
 - Opioid Epidemic.
 - Developing an active shooter plan for maritime facilities.
 - Understanding the security threat from Unmanned Aerial Vehicles (UAVs).
 - Homeport 2.0 for Port Partners.
 - Understanding the cloud.

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- Protecting Industrial Control Systems.
- Tactical Boarding for Passenger Vessels.

Southeastern New England (SENE) AMSC

Suggestions on National Level Polices:

- In order to mitigate the risk of an active shooter scenario on ferry system's in the region, Sector SENE personnel, including the Prevention Department, Response/Enforcement Division and the Contingency Planning and Force Readiness Division have developed, as part of an announced annual safety or security inspection, drills that evaluate a ferry crew's performance during a simulated active threat on board a ferry. Recommend at national level that active threat scenarios be incorporated into regular safety and security drills.
- The Rhode Island Common Operating Picture (RICOP) is nearing completion to be utilized in the Sector SENE Command Center (SCC) in Woods Hole, MA. This system consists of software that integrates multiple Federal, State and Local agencies with the ability to view video cameras strategically placed in the maritime zone of Rhode Island. This system has proven to be extremely useful for responding to all hazards and port security incidents, but was only able to be viewed in the Sector SENE East Providence, RI office. Providing access to the SCC staff has been a goal since the development of the system, as it will be utilized to its fullest potential for daily Maritime Domain Awareness as well as all emergencies. Recommend use of similar systems at national level to increase ability of Sector Command Centers to fill information needs, especially across wide geographic gaps.
- Port Security Forums held biannually and conducted in conjunction with a safety forum, are well-attended events in both Rhode Island and southeastern Massachusetts. These forums, which have been held for over fourteen years and are held in conjunction with a port safety forum, continue to be an excellent venue for the presentation of timely/evolving issues to a broad segment of our port partners; federal, state, and local agencies, and the marine industry. Importantly, these forums provide an audience for our port partners to make presentations and pass information that would otherwise not happen. National level encouragement for these types of meetings may allow for greater dialogue and attendance by Other Government Agencies (OGAs) and other agencies not officially covered under AMSC meetings (e.g., may believe the subject matter does not apply to them).

Suggested Training Topics:

- There has been great success in follow-on trainings on active threat scenarios following the safety and security drills in these scenarios. Subject matter experts from all Sector departments have participated, bringing valuable info to the daily staff of ferries ultimately responsible for the safety of passengers.
- Encourage engagement with state emergency management agencies and agency-led training in common operating picture systems.

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D-5 Consolidated Report

Suggestions on National Level Polices: The AMSCs have been a remarkable success story. Area Maritime Security Plans have been the most reviewed, expanded, exercised, revised, and accepted by interagency and private sector partners of any plans maintained at the port level. Because of this, we are tempted to use the AMSC and the Area Maritime Security Plan (AMSP) as a vehicle to carry out each new idea and port level initiative. The scope of Area Maritime Security (AMS) Assessments has now been expanded. There is also a valid concern regarding cyber security threats to the Marine Transportation System (MTS), and a desire to task the AMSC with developing prevention and recovery strategies for the private sector as part of the AMSP. Though these are noble goals, we must bear in mind that AMSC members are unpaid volunteers on a Federal Advisory Committee who hold senior positions within their organizations and have little additional time to contribute. Sector Port Security Specialists and planning staffs are hard pressed to accomplish the current mission load. Area Maritime Security Assessments, annual Maritime Security Risk Analysis Model (MSRAM) data entry and validation, annual AMSC reports (and, in some cases, annual Port Readiness Committee meetings, exercises, and reports) require significant time and staffing to complete.

- Spreading out the due dates for these efforts, particularly the MSRAM validation and AMSC reports would help.
- Some method of providing national level support through Coast Guard CYBERCOM and Domestic Port Assessment teams, augmented by contractor personnel as feasible, should be considered. Notwithstanding a budget-constrained environment, we must keep in mind that the AMSC is not an unlimited free resource, and must try to balance our demands accordingly.

Delaware Bay AMSC

Suggestions on National Level Polices: AMSC members mirror concerns from published Industry reports (e.g. American Association of Port Authorities (AAPA), Journal of Commerce (JOC), and Maritime Executive) regarding the Administration's FY 2018 budget proposal to cut port security grants by 52 percent to \$48 million. There is a concern that if the funding is reduced by 52 percent only the larger ports such as Los Angeles/Long Beach, and Port of NY/NJ will receive funding. This would then increase the vulnerability of other ports in the nation.

- Stress the importance of this program to DHS so they can advocate keeping this program at its current funding. This program provides an important role in enhancing port security resiliency and recovery capabilities.

North Carolina AMSC

Suggestions on National Level Polices:

- The Coast Guard should continue to seek funding for cyber security training and expertise to meet the constantly changing cyber threat.
- The Department of Homeland Security should continue to include Maritime Domain Awareness as a priority for Port Security Grant Program funding in 2018.

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- Recommend the US Coast Guard and Department of Homeland Security support legislative and/or policy efforts to provide federal, state and local law enforcement with authorities to identify, interdict, and ultimately prosecute cases where maritime infrastructure and key assets are at risk from Unmanned Aerial Systems. Also recommended is US Coast Guard and Department of Homeland Security support for the creation of techniques, tactics, procedures, and funding for equipment needs to safely address potential risks associated with the nefarious or negligent use of unmanned aerial systems.

Suggested Training Topics:

- Recurring training on cyber security (threat awareness, prevention/protection measures, incident response and recovery).

Maryland-NCR AMSC

Suggestions on National Level Polices:

- For USCG Head Quarters (HQ) – Provide more resources for AMSCs to help port partners with cyber security concerns.
- At the Sector level, expertise in cyber protection strategies for commercial as well as government facilities does not exist. Trained personnel to address these concerns would increase awareness and continuity within the ports nationwide.

Virginia AMSC

Suggestions on National Level Polices:

- Contingency Preparedness Planning Manual (CPPM) volume IV update and updated Coast Guard Business Intelligence [CGBI] (IMT readiness) needed to meet exercise and Incident Command System (ICS) staffing requirements.
- Homeport 2.0 functionality concerns.

Suggested Training Topics:

- ICS 339 needed at the Sector level not at District (area command has no operational requirement) which left Sectors scrambling for limited seats. Districts do need the ICS 400 portion. Recommend splitting the courses.
- Homeport usability remains affected since the upgrade. Administrator functions are non-existent to the point we cannot assist members or new applicants at all.

Charleston AMSC

Suggestions on National Level Polices:

- Cyber security remains a growing and dynamic concern. The Charleston AMSC Cyber Subcommittee continues identifying cyber vulnerabilities and informing maritime

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transportation system stakeholders of those vulnerabilities to mitigate port and other risks presented to the entire maritime transportation system. However, understanding and functioning along a deliberate pathway to resilience remains under development.

- The Rear Admiral Richard E. Bennis Award for Excellence in Maritime Security is the superlative way through which to recognize achievement and contribution in pursuit of safeguarding the maritime transportation system. Whereas the award, named in honor of an outstanding Coast Guard leader and former COTP of Charleston, recognizes the achievements and contributions of the maritime community, it could expand to recognize Coast Guard leaders who demonstrate superlative leadership over multi-agency and multi-industry teams, like the AMSC. This form of leadership is distinctly different from organizational leadership to which the Coast Guard Inspirational Leadership award program applies. We could improve by offering Coast Guard members a multi-agency leadership award, an “Enterprise Leadership” award, by expanding the applicability and criteria of the Bennis award.

Florida Keys AMSC

Suggestions on National Level Polices:

- More notice and visibility within the Port Security Grant program. The last minute Grant Program guidance release, combined with the extremely shortened application deadlines, puts a tremendous undue burden on our smaller minimally staffed AMSC agency partners to meet the requirements.

Savannah AMSC

Suggestions on National Level Polices:

- Port Security Grant Program (PSGP) - Cyber Security: With Cyber Security threats and risks being high on the Coast Guard's List of Priority, Cyber Security does not appear to be reflected as such in reference to the PSGP National Priorities and their grant awarding.
- PSGP: What is the current focus on Port Security Grants awards? Are the grants to assist with sustainability and maintenance of existing security infrastructure or for new capabilities? The last few rounds of PSG awards appeared focused towards maritime domain sustainment.

Southeast Florida AMSC

Suggestions on National Level Polices:

- Recent budget reductions have eliminated the availability of supplemental funding and are having an impact on the COTP/Federal Maritime Security Coordinator (FMSC) ability to conduct additional AMSC activities, particularly meetings with the Sector Miami regional executive steering committee. This committee normally meets at least twice yearly, however due to funding cuts; this committee was only able to hold one meeting in 2017.

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D-8 Consolidated Report

Suggestions on National Level Polices:

- Due the large geographical distances in the D8 Area of Responsibility (AOR), most COTPs have AMSCs in multiple states requiring extensive travel to conduct in-person meetings. In-person meetings assist with the networking required to know who you would be collaborating with prior to an incident on the MTS. Funding to support Coast Guard AMSC mandated activities is essential in keeping all ports safe, secure and the MTS economically viable.
- CG-[Office of Port and Facilities Compliance] FAC needs to continue providing AMSC Support Funds on an annually reoccurring basis. If possible, these funds need to be made available early in the fiscal year.

Houston-Galveston AMSC

Suggestions on National Level Polices: Continued budget reductions, specifically related to travel, have affected the ability to support the AMSC activities within COTP zones, and to adjacent AMSCs.

- Recommend restoration of supplemental AMSC funds in support of activities within the COTP Zone. Additionally, it is recommended that funding be identified for restoration of a national conference or event to be held for AMSC leadership. This provides for crucial collaboration time with Committees from around the nation, and facilitates the employment of best practices as shared in these reports.

Gulf of Mexico AMSC

Suggestions on National Level Polices:

- This year's cyber exercise highlighted the need to establish better communication between Information Technology (IT) and Operational Technology (OT) personnel, particularly in areas of high-risk operations such as offshore oil and gas drilling and production. The exercise caused the AMSC to add new sections to the AMSP, but the Committee realizes that these sections will require further refinement in the future.

Mid-South AMSC

Suggestions on National Level Polices: Homeport (HP) 2.0 -when the program was released in mid-October 2017, the Port Security Specialist (PSS) were provided with a 99-page user guide and approximately 45 minutes of familiarization training via Skype and teleconference. Sector Lower Mississippi River (SLMR) PSS created task specific job aids, which were shared with CGD8 PSS and CG-FAC. In cooperation with CG-FAC, SLMR PSS drafted a 77-slide step-by-step job aid for establishing an AMSC community in HP 2.0 and agreed to assist CG-FAC with additional training for all PSS in December 2017.

- To date, no job aids or training materials have been provided to help PSS train and familiarize the AMSC members. Both USCG personnel and external HP 2.0 end users are encountering a less than satisfying experience regarding login issues and slow screen loads.

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- Additionally, CG-7612 is not communicating with the PSS regarding the status of HP 2.0 features that are not yet functional, such as AMSC management features. A quarterly HP 2.0 Newsletter would be greatly appreciated.

New Orleans AMSC

Suggestions on National Level Polices: There are no national level recommendations for areas of improvement from the New Orleans AMSC in CY18.

Suggested Training Topics:

- Given the potential regulatory requirements proposed in NVIC 05-17, New Orleans Port Area port partners and stakeholders are requesting additional and reoccurring Cyber Security training on Cyber threats and attack trends.

Northeast Gulf of Mexico AMSC

Suggestions on National Level Polices: CG wide reductions in fleet programs have reduced vehicle availability for PSSs who are competing for a limited supply of vehicles for day travel throughout a large AOR. Interaction with maritime industry personnel and other stakeholders is key to maintaining robust relationships. In addition, the lack of vehicle availability routine business requirements, the unpredictable nature of determining when to conduct “relationship maintenance” visits make it difficult to pre-schedule opportunities to “hit the road.”

- Consideration should be given to providing a PSS assigned vehicle to units that have two or more PSSs operating in large AORs, or units having multiple ports and subcommittees to use primarily for meetings, stakeholder visits, conducting MSRAM assessments, etc.

Ohio Valley AMSC

Suggestions on National Level Polices: Provide support funding for AMSCs.

Suggested Training Topics: Continued security analyst training for PSSs nationwide,

- Enhanced cyber security training for PSSs nationwide.
- HOMEPART 2.0 field level user and administrator training.
- Chemical, Biological, Radiological, Nuclear, and Explosives (CBRNE) training for PSSs.

Sabine-Neches AMSC

Suggestions on National Level Polices:

- Further review of impact to Risk Group A Facilities impacted by 2018 TWIC Reader Rule.

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- Need of Brown Water Marine Transportation System infrastructure review to address security of Inter-Coastal Waterway (ICW) and Army Corp of Engineer (ACOE) locks in Lake Charles, LA.

Suggested Training Topics:

- TWIC Enforcement for Risk Group A Facilities.
- Cybersecurity for Maritime Transportation Security Act (MTSA) Regulated Facilities.

Saint Louis AMSC

Suggestions on National Level Polices:

- Consider re-establishing AMSC support funding for larger geographical Sectors to enable travel to multiple AMSC locations within the Sector's AOR.
- Recommend CG-FAC to champion Captain of The Port (COTP) concerns for Inland River areas with significant maritime response limitations. During the Port Security Grant COTP Field Review process, projects devoted to building OGA boathouse capability score very high. In recent years, COTP comments made during the Field Review process have consistently supported the need to improve local response efforts.

South Texas AMSC

Suggestions on National Level Polices:

- Encourage AMSC-InfraGard dialogue and engagement. InfraGard is a public-private partnership between the Federal Bureau of Investigation (FBI), OGAs, and private industry. The emphasis of the program is on infrastructure protection with a strong emphasis on cybersecurity. AMSCs are encouraged to contact their nearest InfraGard chapter and consider applying for membership. The benefit of this engagement is the ability to capitalize on an existing mature cybersecurity program to help mitigate potential vulnerabilities.

Lake Michigan AMSC

Suggestions on National Level Polices: We are still finding it difficult to get traction for vibrant cyber subcommittees. There appear to be a variety of reasons for this, some outlined earlier in the report submitted.

- Given the criticality of the issue, we will continue to advocate for enhanced cyber security in our maritime community and for an integrated approach by Committee members.

Sault Region AMSC

Suggestions on National Level Polices:

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- Overall outreach to stakeholders in the geographically remote areas of the Sector's Area of Responsibility remains a primary area in need of improvement for the Sault Region AMSC. Time, staffing, and funding are the primary impediments to addressing this issue.

Southeast Michigan AMSC

Suggestions on National Level Polices: Creation of AMSC portal site/sharing site.

Central California AMSC

Suggestions on National Level Polices: The current structure of the Port Security Grant Program (PSGP) has the project investment justifications (IJs) from MTSA regulated entities (potential terrorist targets), competing against IJs from emergency response agencies who would try to aid them, post TSI.

- Consider approaching CG-Port Security Assessment (PSA) and Federal Emergency Management Agency's (FEMA) Grants Program Directorate (GPO) and suggesting the restructuring of the PSGP to reflect "Prevention" and "Response" frameworks. Each pot of money would be dedicated to its respective functional group.
- Further, with the annual allocation historically at \$100 million dollars, a 50/50 split may not be the best solution. In this COTP zone, we average 55 projects per year. Approximately 60% are MTSA entity origin (i.e., prevention) and 40% are emergency responder origin (i.e., response). While funding requests vary, it would seem to make sense to fund preventative measures to a greater degree than response measures.

Northern California AMSC

Suggestions on National Level Polices:

- Coast Guard should make an effort to standardize the COTP field review. A standardized field review process may maximize time efficiencies and help the Coast Guard to socialize to congressional staffers and FEMA that the field review takes a minimum amount of time to conduct, and this should be accounted for in the PSGP's overall approval timeline.

Suggested Training Topics:

- Port stakeholders should receive instruction in effective grant proposal writing.

San Diego AMSC

Suggested Training Topics: Incident Command System (ICS) for Executives (FEMA course G402).

- Senior Officials Workshop (FEMA course MGT 312).
- Defense Support for Civil Authorities (DSCA) Process.
- Emergency Operations Center Management Training.
- Executives Role in the Unified Command.

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- Stafford Act.
- Cyber Security.

Columbia River AMSC

Suggestions on National Level Policies:

- Areas for national level improvement include linking grant funding to reducing the overall security risk as measured in MSRAM or in the accomplishment of goals identified in each respective Captain of the Port's Risk Management Plan.
- Individual waterfront facilities and ports located along large marine transportation systems like the Columbia River and similar locations might find it difficult to justify grant-funded projects that contribute to the enhancement of the security across the entire system. Trade associations, local government mutual aid compacts and other public/private interest cooperatives may be better positioned to design and implement system wide security enhancement projects. Consequently, consideration should be given to adjusting the matching funds requirement of the grant process to favor those organizations that could more effectively produce system wide security improvements.
- Establishment of applicable sub-committees based upon subject matter expertise and applicability to the area.
- Geo-diversity of Area Maritime Security Training and Exercise Program (AMSTEP) exercises to ensure inclusion of more remote port partners such as Coos Bay and Grays Harbor.

Suggested Training Topics:

- Need for detailed cyber-security training by DHS Cyber Security Advisor (CSA) to AMSC members.
- Need to incorporate results of the ongoing Regional Disaster Preparedness Organization (RDPO) study in conjunction with newly promulgated District 13 requirements regarding exercises and plans for Maritime Active Shooter Incidents (MASI) into next revision of AMSP. The Sector Columbia River (SCR) Contingency Planning/Force Readiness Division intends to participate in the study by contributing to a resource/capability/jurisdiction analysis, gap analysis, joint training plan, and tabletop exercise with key stakeholders/partners.

Puget Sound AMSC

Suggestions on National Level Policies:

- National Statistics based on the information contained in this database should get pushed back out to the AMSC across the country.
- Production of a National AMSC Newsletter by USCG HQ that should contain information from the Report Summary should be sent back out to the AMSC.

Suggested Training Topics:

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- National Statistics.
- Best Practices of AMSC's, Breaches of Security and TSI's across the Nation.

Commonwealth of Northern Mariana Islands AMSC

Suggestions on National Level Polices:

- Implement TWIC requirements in 2018.

Suggested Training Topics:

- General TWIC training.

Guam AMSC

Suggested Training Topics:

- RADNUC Awareness Response Training.
- National Association of State Boating Law Administrators [NASBLA] Phase II- Train the Trainer.

Hawaii and American Samoa AMSC

Suggestions on National Level Polices:

- National-level support to fund further development of the Hawaii Alternate Port Initiative will be essential to the post disaster resiliency of the Hawaii MTS.
- Recommend a legal opinion be crafted to determine the Stafford Act applicability to a cyber-attack.

Prince William Sound AMSC

Suggestions on National Level Polices: The previously issued Area Maritime Security program funds were extremely important to attend training, travel to other port areas in our AOR and provide Funds to travel for unplanned activities or exercises.

- Without these funds, the Port Security program is limited to Exercise funds and competing with an already limited unit budget.

Suggested Training Topics:

- Provide practical Cyber Security training for Facility inspectors for better understanding of current and forthcoming regulations.

Southeast Alaska AMSC

Suggestions on National Level Polices:

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- CPPM volume IV update and updated CGBI (Incident Management Team [IMT] readiness) needed to meet exercise and ICS staffing requirements.
- Homeport 2.0 guidance.

Suggested Training Topics:

- ICS 339 needed at the Sector Level not at District (Area Command has no operational requirement) which left Sectors scrambling for limited seats. Districts do need the ICS 400 portion. Recommend splitting the courses.
- Homeport usability remains affected since the upgrade. Administrator functions are non-existent to the point we cannot assist members or new applicants at all.

Western Alaska AMSC

Suggestions on National Level Polices:

- The dissemination of security related information, maintaining situational awareness, improving regional cooperation on maritime security, and coordination of marine transportation system protection and recovery, in the Arctic region continues to present unique challenges.